

ORIGINAL

Approved: Jun Xiang
 JUN XIANG
 Assistant United States Attorney

Before: THE HONORABLE HENRY B. PITMAN
 United States Magistrate Judge
 Southern District of New York

19 MAG 7708

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of
	:	18 U.S.C. §§ 371,
CHRISTOPHER ANSAH,	:	553(a)(1), 2312, 2313,
	:	and 2
Defendant.	:	
	:	COUNTY OF OFFENSE:
----- X	:	BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEVEN THAU, being duly sworn, deposes and says that he is a Detective with the Waterfront Commission of New York Harbor, and charges as follows:

COUNT ONE

(Conspiracy to Export, Transport, and Possess Stolen Motor Vehicles)

1. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, the exportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 553(a)(1), the transportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 2312, and the possession of stolen motor vehicles, in violation of Title 18 United States Code, Section 2313.

2. It was a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did knowingly export and attempt to export motor

vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 553(a)(1).

3. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did transport, in interstate and foreign commerce, motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312.

4. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, CHRISTOPHER ANSAH, the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about May 14, 2018, ANSAH loaded stolen motor vehicles, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

b. On or about November 2, 2018, ANSAH oversaw the loading of a stolen motor vehicle, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Exportation of Stolen Motor Vehicles)

6. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did export and attempt to export motor vehicles, knowing the same to have been stolen, to wit, ANSAH exported and

attempted to export stolen cars by placing them in shipping containers bound for West Africa.

(Title 18, United States Code, Sections 553(a)(1) and 2.)

COUNT THREE

(Transportation of Stolen Motor Vehicles)

7. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did transport in interstate and foreign commerce motor vehicles, knowing the same to have been stolen, to wit, ANSAH transported and aided and abetted the transportation of stolen motor vehicles from the Bronx to New Jersey, which motor vehicles were bound for West Africa.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT FOUR

(Possession of Stolen Motor Vehicles)

8. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, to wit, ANSAH received and possessed in New York State motor vehicles stolen from outside New York State and stored or concealed them in shipping containers bound for West Africa, knowing those vehicles were stolen.

(Title 18, United States Code, Sections 2313 and 2.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

9. I am a Detective with the Waterfront Commission of New York Harbor assigned to a joint task force with the United States Department of Homeland Security, Homeland Security Investigations. I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts

that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

10. Based on my training and experience, my involvement in this investigation, and my conversations with other law enforcement officers, I am familiar with schemes in which stolen motor vehicles--typically, high-end luxury cars--are sent in shipping containers, under fraudulent export paperwork, to buyers in West Africa. Such schemes work as follows, with some variation:

a. Members of the scheme (the "Thieves") obtain the high-end motor vehicles (the "Luxury Cars") either by stealing them outright from the street or by renting them from car rental companies and never returning them.

b. The Thieves drive the Luxury Cars to a prearranged location where the Luxury Cars can be stored temporarily (the "Layup Location").

c. Other members of the scheme pick up the Luxury Cars from the Layup Location and drive them to a second prearranged location (the "Loading Location"), where they are loaded into shipping containers (the "Shipping Containers"). A member of the scheme may coordinate or be in charge of loading the Luxury Cars at the Loading Location. Each Shipping Container can typically be loaded with two or three Luxury Cars.

d. The Shipping Containers are hauled by truck to a seaport, where they are placed on ships bound for destinations in West Africa. The export paperwork for each Shipping Container typically represents, in substance and in part, that the container is carrying low-value household products and/or low-end motor vehicles, when in fact it is carrying stolen Luxury Cars.

11. Beginning in or about May 2018, I began conducting regular physical surveillance of a shipping business located in the Bronx, New York (the "Shipping Business"). During the physical surveillance, I observed the following:

a. From at least in or about May 2018 up to and including at least in or about December 2018, stolen high-end cars--i.e. Luxury Cars--would be driven to and parked in front of, inside, or near the Shipping Business. I knew the Luxury

Cars to be stolen because I compared the vehicle identification numbers ("VINs") and/or license plates of the Luxury Cars with the VINs and license plates of vehicles reported to be stolen or missing by car rental companies and/or law enforcement agencies.

b. During this period, CHRISTOPHER ANSAH, the defendant, would routinely drive the Luxury Cars found near the Shipping Business. For example:

i. On or about June 12, 2018, I observed ANSAH enter a Toyota Highlander that was parked in front of the Shipping Business and drive it to his residence. According to a records search, this vehicle was owned by a car rental company in Florida and had been reported missing.

ii. On or about November 1, 2018, I observed ANSAH sitting in the driver's seat of another Toyota Highlander, while the engine was running, near the Shipping Business. According to a records search, this vehicle was owned by a car rental company in New Jersey and had been reported stolen on or about November 26, 2018.

c. The Luxury Cars would be loaded into Shipping Containers that were dropped in front of the Shipping Business. On several occasions, ANSAH would personally load the Luxury Cars into the Shipping Containers. For example:

i. On or about May 14, 2018, I observed ANSAH operate a forklift to load two Luxury Cars--a Toyota RAV4 and a Toyota Highlander--into a Shipping Container bearing serial number ACLU9661417, which had been dropped in front of the Shipping Business.¹ According to records searches, the Toyota RAV4 was owned by a car rental company in Georgia and had been reported stolen on or about March 12, 2018, and the Toyota Highlander was owned by a car rental company in Florida and had been reported stolen on or about June 5, 2018.

ii. On or about November 2, 2018, I observed ANSAH direct the loading of a white Range Rover Evoque into a Shipping Container bearing serial number MRKU2110952, which had been dropped in front of the Shipping Business. According to a records search, the Range Rover Evoque was owned

¹ Based on my training and experience, I am aware that every shipping container has a unique serial number.

by an individual in New Jersey and had been reported stolen on or about October 30, 2018.

d. On or about May 14, 2018, I observed CHRISTOPHER ANSAH, the defendant, driving a Hyundai Santa Fe which had been reported stolen out of an airport in Massachusetts. I conducted a traffic stop of the Hyundai Santa Fe, during which ANSAH stated, in sum and substance, that he was the owner of the Shipping Business. ANSAH further stated, in sum and substance, that he shipped only humanitarian goods and supplies to Africa.

12. Based on my personal observation, my discussion with other law enforcement officers, and my review of shipping records, I have learned that the Shipping Containers into which Luxury Cars were loaded were taken to seaports for transportation to locations in West Africa. For example:

a. The Shipping Container bearing serial number ACLU9661417--into which I observed CHRISTOPHER ANSAH, the defendant, load a stolen Toyota RAV4 and a stolen Toyota Highlander on or about May 14, 2018--was intended for transportation to Ghana and was intercepted at the New York Container Terminal in Staten Island, New York, on or about June 5, 2018. I inspected the contents of this Shipping Container and found inside the above-mentioned Toyota RAV4 and Toyota Highlander.

b. The Shipping Container bearing serial number MRKU2110952--into which I observed ANSAH oversee the loading of a stolen Range Rover Evoque on or about November 2, 2018-- was intended for transportation to Ghana and was intercepted at Port Newark in New Jersey on or about November 7, 2018. I inspected the contents of this Shipping Container and found inside the above-mentioned Range Rover Evoque, as well as a Toyota RAV4 which, based on a records search, was owned by a car rental company in Missouri and was reported missing on or about November 7, 2018.

13. Based on my training and experience, I am aware that cargo to be exported from the United States must be declared in a filing called the Electronic Export Information ("EEI"). I am further aware that the EEI for a shipping container is typically prepared by the freight forwarder--i.e. the company that provides the shipping container--on the basis of information provided to the freight forwarder by the party whose cargo is to be shipped.

14. Based on my review of shipping records, I have learned that the EEIs for the Shipping Containers stated, falsely, that the contents of the Shipping Containers were low-value goods and/or low-end vehicles. For example:

a. The EEI for the Shipping Container bearing serial number ACLU9661417--which was found to contain a stolen Toyota RAV4 and a stolen Toyota Highlander--falsely stated that the Shipping Container contained used auto parts and household goods.

b. The EEI for the Shipping Container bearing serial number MRKU2110952--which was found to contain a stolen Range Rover Evoque and a stolen Toyota RAV4--falsely stated that the Shipping Container contained pieces of used auto parts and a 2007 Ford Freestyle.²

15. Because, as set forth above, the information contained in an EEI reflects information provided to the freight forwarder by the party whose cargo is to be shipped, I believe that CHRISTOPHER ANSAH, the defendant, caused the filing of false EEIs for the Shipping Containers.

16. Based on my physical surveillance of the Shipping Business, inspection of the Shipping Containers by me and other law enforcements officers, my review of shipping records, and my conversations other law enforcement officers, I have learned that, during the period from May 2018 to December 2018, approximately stolen 56 Luxury Cars were loaded into Shipping Containers in front of the Shipping Business. Based on my training and experience and publicly available market data, I estimate that the value of those Luxury Cars exceeded \$2 million.

² In addition, the EEI falsely stated that the Shipping Container contained an older-model Toyota RAV4 and listed a VIN that was not the VIN of the stolen, newer-model Toyota RAV4 actually found inside the Shipping Container. The EEI also stated that the Shipping Container contained a 2005 Ford Escape, a salvage vehicle, which was true.

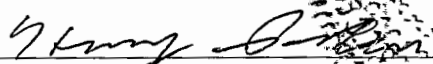
WHEREFORE, I respectfully request that a warrant be issued for the arrest of CHRISTOPHER ANSAH, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.


STEVEN THAU

Detective

Waterfront Commission of New York Harbor

Sworn to before me this
16 day of August 2019


THE HONORABLE HENRY B. PITTMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK